

REMARKS

This paper is being provided in response to the Office Action mailed October 7, 2003, for the above-referenced application. Applicants submit herewith a Declaration of Keisuke Goto under 37 C.F.R. 1.131 with accompanying Exhibits to swear behind the references cited in the Office Action, as further discussed below.

Applicants thank the Examiner for the allowance of claim 24.

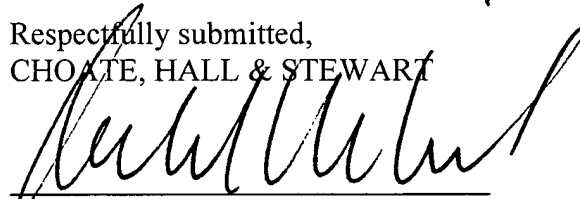
The rejection of claims 1-3, 5-7, 9, 17-19 and 21-23 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,346,839 to Mnich (hereinafter "Mnich") and the rejection of claims 4, 8 and 20 under 35 U.S.C. 103(a) as being unpatentable over Mnich in view of JP 2000196444 to Iwamoto (hereinafter "Iwamoto") are hereby traversed and reconsideration is respectfully requested in view of the Declaration under 37 C.F.R. 1.131 submitted herewith.

The Mnich reference has an earliest effective prior art date of April 3, 2000, and the Iwamoto reference has an earliest effective prior art date of July 14, 2000. Submitted herewith is a Declaration of inventor Keisuke Goto under 37 C.F.R. 1.131 that provides statements and documents establishing that Keisuke Goto was reasonably diligent in working to reduce the claimed invention to practice from a time prior to April 3, 2000, until the invention was constructively reduced to practice on April 5, 2000. Applicants respectfully submit that in view of the Declaration under 37 C.F.R. 1.131 and accompanying Exhibits, Applicants show a date of invention in a WTO country (Japan) that is earlier than the effective prior art dates of both Mnich

and Iwamoto. Accordingly, Applicants respectfully request that these references and the rejections deriving therefrom be withdrawn.

Based on the above, Applicants respectfully request that the Examiner reconsider and withdraw all outstanding rejections and objections. Favorable consideration and allowance are earnestly solicited. Should there be any questions after reviewing this paper, the Examiner is invited to contact the undersigned at 617-248-4038.

Respectfully submitted,
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